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October 4, 2024

Hon. Valerie Caproni
United States District Court
40 Foley Square, Room 240
New York, NY 10007

Re: Benthos v. Etra, 20-CV-3384

Dear Judge Caproni:

I am writing on behalf of Benthos in response to the Court's Order dated September 20, 2024 (Dkt. 462). Mr. Etra's counsel has been forwarding monthly declarations from Mr. Etra (together with monthly statements showing very little activity), although our understanding is that counsel is merely passing along the declarations with no effort at verifying the truth of their contents.

Nonetheless, the monthly reporting requirement, and the possibility of a renewed contempt citation if Mr. Etra is found to be receiving and spending money or other items of value (other than Social Security) that he is not disclosing, or to be concealing accounts as he has repeatedly done in the past, provides at least some check on Mr. Etra resuming his prior flagrant flouting of his legal obligations pursuant to the Restraining Order. For that reason, Benthos respectfully requests that the requirements set forth in Dkt. 452 – all of them, including but not limited to his passport being held in the custody of the Clerk of the Court – remain in place indefinitely.

Benthos thanks Your Honor for your continuing attention.

Respectfully submitted,

s/

Steven R. Popofsky

cc: Daniel McGuinness (by e-mail and ECF)